



January 31, 2018

Mr. Wayne Kino  
Director of Enforcement  
Bay Area Air Quality Management District  
375 Beale Street, Suite 600  
San Francisco, CA 94105

Re: Tesla, Inc. Fremont Factory Site E0459  
Semi-annual Reports for MACT Subpart IIII, NSPS Subpart MM, and Title V Stan. Condition I.F  
Title V Annual Compliance Certification Standard Condition I.G

Dear Mr. Kino:

This report satisfies the semi-annual reporting requirements for Tesla, Inc. Fremont Factory Site E0459 for NSPS Subpart MM 60.395, MACT Subpart IIII 63.3120, and Title V Standard Condition I.F for reporting period July 1, 2017 through December 31, 2017. This report also contains the Annual Title V Compliance Certification pursuant to Title V Standard Condition I.G covering the period of January 1, 2017 through December 31, 2017.

The semi-annual MACT report covers the specific general requirements identified in Part 63.3120 which include the following:

- A. Company name and address
- B. Statement by responsible official with official's name, title and signature certifying the truth, accuracy, and completeness of report.
- C. Date of report and beginning and ending dates of the reporting period.
- D. Identification of compliance option specified in § 63.3082(c)
- E. Certification of deviation occurrence during reporting period.

Unless otherwise noted, the Fremont Factory had no instances of exceeding limits specified under 60.392 during the reporting period.

If you have any questions regarding the enclosed information, please contact Callie Nguyen at 510-249-3006.

Sincerely,

Jim Smargiassi  
Manager – Environmental Affairs

cc: Ms. Debbie Jordan, Director of Air Division, USEPA Region IX

**Semi-annual Title V Compliance Certification pursuant to Standard Condition I.F**

Based upon the information and belief formed after a reasonable inquiry, I, as responsible Official of the Tesla, Inc. facility in Fremont, CA, submit the information contained in the semiannual Title V report as accurate and true to the best of my knowledge.

Laurie Shelby

\_\_\_\_\_  
Name of Responsible Official

\_\_\_\_\_  
Signature

July 1, 2017 through December 31, 2017

Compliance Period

1/31/2018

\_\_\_\_\_  
Date

Facility # E0459

Tesla, Inc.

45500 Fremont Boulevard

Fremont, CA 94538

**Tesla Motors, Inc**  
**Notification of Compliance Status (NOCS) Report**

Submitted in Accordance with 40 CFR Part 63, Subpart IIII — National Emission Standards for  
Hazardous Air Pollutants: Surface Coating of Automobiles and Light Duty Trucks.

**I. SECTION I**

**GENERAL INFORMATION**

<b>Operating Permit Number</b>		<b>Facility I.D. Number</b>	
		E0459	
<b>Responsible Official's Name/Title</b>			
Laurie Shelby, Vice President – Environmental Health Safety and Sustainability			
<b>Street Address</b>			
45500 Fremont Blvd			
<b>City</b>	<b>State</b>	<b>ZIP Code</b>	
Fremont	California	94538	
<b>Facility Name (if different from Responsible Official's Name)</b>			
Tesla, Inc.			
<b>Facility Street Address (If different than Responsible Official's Street Address)</b>			
Same as responsible official's address			
<b>Facility Local Contact Name</b>		<b>Title</b>	<b>Phone</b>
Callie Nguyen		Global Air Program Manager	510-249-3006
<b>City</b>	<b>State</b>	<b>ZIP Code</b>	
Fremont	California	94538	
<b>Basis for this notification</b>		<b>Compliance Date (mm/dd/yy)</b>	
40 CFR 63.3110		1/31/2018	
<b>Date of This Report</b>		<b>Reporting Period</b>	
January 31, 2018		July 1, 2017 through December 31, 2017	

**II. SECTION II**

**CERTIFICATION**

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the Tesla, Inc., certify the information contained in this report is accurate, true and complete to the best of my knowledge. The facility has complied with the relevant standard or and other applicable requirements referenced in the relevant standard.

<b>Name of Responsible Official</b>	<b>Title</b>	<b>Date (mm/dd/yy)</b>
Laurie Shelby	Vice President – Environmental Health Safety	January 31, 2018
<b>Signature of Responsible Official</b>		

[§63.3110(c)(2) & (c)(5)]

### III. SECTION III

#### IDENTIFICATION OF COMPLIANCE OPTIONS

<u>Process</u>	<u>Compliance Option</u>
E-Coat Primer	Grouped with Topcoat, Primer, E-Coat, Plastics and Misc. Metals
Primer-Surfacer	Grouped with Topcoat, Primer, E-Coat, Plastics and Misc. Metals
Topcoat	Grouped with Topcoat, Primer, E-Coat, Plastics and Misc. Metals
Final Repair	Grouped with Topcoat, Primer, E-Coat, Plastics and Misc. Metals
Glass Bonding Primer	Grouped with Topcoat, Primer, E-Coat, Plastics and Misc. Metals
Glass Bonding Adhesive	Grouped with Topcoat, Primer, E-Coat, Plastics and Misc. Metals
Underbody Coatings	Grouped with Topcoat, Primer, E-Coat, Plastics and Misc. Metals
Sealers & Adhesives	Grouped with Topcoat, Primer, E-Coat, Plastics and Misc. Metals
Deadeners	Grouped with Topcoat, Primer, E-Coat, Plastics and Misc. Metals
Plastic Coating	Grouped with Topcoat, Primer, E-Coat, Plastics and Misc. Metals
Misc. Metal Coating	Grouped with Topcoat, Primer, E-Coat, Plastics and Misc. Metals

[§63.3110(c)(4)]

### IV. SECTION IV

#### DEVIATIONS FROM MACT REQUIREMENTS

*No deviations from the emissions limitations, specified under the MACT guidelines occurred during this period.*

[§63.3110(c)(6)]

## Annual Title V Compliance Certification pursuant to Standard Condition I.G

I, as responsible Official of the Tesla, Inc. facility in Fremont, CA, submit the information contained in the annual Title V certification as true, accurate, and complete based on information and belief formed after reasonable inquiry.

Laurie Shelby

Name of Responsible Official

Signature

January 1, 2017 through December 31, 2017

Compliance Period

1/31/2018

Date

Facility # E0459

Tesla, Inc.

45500 Fremont Boulevard

Fremont, CA 94538

### DEVIATIONS FROM TITLE V REQUIREMENTS

**January 1, 2017 through December 31, 2017**

Source No	Description of Deviation	Compliance Status
S3716	Source was not abated following unexpected power outage. District notified via deviation letter dated November 3, 2017.	I
N/A	Discovery of an unpermitted standby diesel generator installed and operational without an ATC or PTO. BAAQMD was informed of this deviation on December 22, 2017.	N/A
S805	<p>This source exceeded the permit emission limit and the emissions have been documented in the monthly emission report (dated December 26, 2017) provide to the agency.</p> <p>Notwithstanding the above, Tesla believes that actual emissions are below the emission limit. Tesla believes the emission factor may not represent actual operating conditions. Tesla is currently evaluating a more accurate emission factor to be applied for this fugitive emission source. Once this evaluation concludes, Tesla will work with BAAQMD to revise accordingly.</p>	I